

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE:

PETITION OF CONTACT LIFE LINE OF
THE HIGHLAND RIM, INC. FOR
ALLOCATION OF AN N11 NUMBER
(ABBREVIATED DIALING CODE)

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T.R.A. DOCKET ROOM

TRA Docket No.

05-00275

PETITION FOR ALLOCATION OF AN N11 NUMBER

CONTACT Life Line of the Highland Rim, Inc. ("Petitioner") respectfully submits this Petition for Allocation of an N11 Number (211) for the purpose of providing health and human services information and referral to citizens in Bedford, Coffee, Franklin, and Moore Counties in Tennessee.

INTRODUCTION

1. Petitioner is a charitable not-for-profit corporation, qualified as tax exempt under Section 501(c)(3) of the Internal Revenue Code (the "Code"), with its principal place of business in Tullahoma, Tennessee.

2. CONTACT Life Line of the Highland Rim is an accredited 24-hour confidential help line offered free of charge to all persons in Bedford, Coffee, Franklin and Moore Counties in Tennessee. CONTACT offers crisis intervention, resource information, reassurance for the elderly and a listening ear for all callers. CONTACT Life Line of the Highland Rim recruits, equips, and supports volunteer telephone workers to respond to callers with active non-judgmental, non-directive listening.

NUMBERING RESOURCE AS TO WHICH ALLOCATION IS SOUGHT

3. Petitioner seeks allocation of the 211 abbreviated dialing code for Bedford County, Coffee County, Franklin County, and Moore County (the "Proposed Coverage Area").

STANDARD FOR GRANT OF PETITION

4. In its July 31, 2000 Order (the "FCC Order"), CC Docket No. 92-105, ¶ 2, the Federal Communications Commission (the "FCC") expressly reserved the 211 abbreviated dialing code for "community information and referral services."

5. Pursuant to the October 20, 1993 Order (the "TRA Order"), Docket No. 92-13892, issued by the Tennessee Public Service Commission, the following factors and criteria are used to select the most qualified applicant for an allocation of N11 number resources:¹ (i) overall financial fitness, both historical and future; (ii) overall ability (technical ability and otherwise) and willingness to provide service on a permanent and continuous basis; (iii) ability and willingness to abide by Tennessee Regulatory Authority ("TRA") rules and policies; (iv) rates, services and collection practices to be utilized by petitioner in the provision of N11 service; (v) extent and duration of petitioner's service to the local community included in the N11 allocation; (vi) anticipated future uses by the community of the proposed service to be offered by the petitioner and the petitioner's overall experience providing information to the community to be served; and (vii) the type of information services to be provided by petitioner through an abbreviated dialing code, and its relative value to the public and local community. In addition, a petitioner for allocation of N11 number resources must agree to abide by the terms, conditions and rates for N11 service, which shall not exceed those set forth in the applicable Tariff.

REASONS SUPPORTING ALLOCATION OF N11

6. Petitioner seeks to utilize the 211 abbreviated dialing code for provision of community information and referral services, pursuant to the TRA Order and FCC Order.

¹ See July 14, 2000 TRA Order, Docket No. 99-00743, reallocating 211 abbreviated access code to Knoxville Information and Referral, Inc. and applying factors pursuant to the TRA Order.

7. Petitioner satisfies the criteria set forth in the TRA Order:

(a) Overall Financial Fitness, Both Historical and Future. Last year CONTACT Life Line of the Highland Rim raised in excess of \$78,000. The organization currently (2003 Financial Review) has unrestricted net assets of \$55,000. CONTACT Life Line of the Highland Rim has the active support of community leaders on its Board of Directors and committees to insure continued future financial success of the organization. In addition, Petitioner will solicit additional funds for the abbreviated access number service from the public sources, corporate, individual and local United Ways.

(b) Overall Ability (Technical Ability and Otherwise) and Willingness to Provide Service on a Permanent and Continuous Basis. If allocated an abbreviated dial code, Petitioner will provide N11 service on a permanent and continuous basis. CONTACT Life Line of the Highland Rim will provide ongoing 24-hour, 7-day per week, 365-days per year. Services are provided by a staff of 4 (2 FTE's) and 60 volunteers. CONTACT Life Line of the Highland Rim receives approximately 27,000 calls per year.

(c) Ability and Willingness to Abide by TRA Rules and Policies. Petitioner will comply with all present and future rules promulgated by the TRA, including without limitation those applicable to abbreviated access dialing service.

(d) Rates, Services and Collection Practices to Be Utilized by Petitioner in the Provision of N11 Service. As more particularly described in Paragraph 1, above, Petitioner is a not-for-profit entity committed to providing free community information and referral services to the population of the Proposed Coverage Area. Petitioner proposes to pay all charges incurred in connection with the assignment and utilization of the abbreviated access code and the costs of ongoing operation of

the abbreviated access number service, other than any applicable user-generated charges resultant from access to the service by cellular phone.

(e) Extent and Duration of Petitioner's Service to the Local Community Included in the N11 Allocation. Since 1981, Petitioner has been committed to community service in the Bedford, Coffee, Franklin, and Moore Counties and had developed a close relationship with social service providers in the Proposed Coverage Area I a cooperative effort to enhance and improve the delivery of beneficial services to the community. Formed in 1981, Petitioner's mission is to "respond 24-hours daily to the emotional needs of callers with confidential, non-judgmental, active listening by fostering self-directed resolution, by offering referrals or by intervention through telephone conversation with a CONTACT volunteer." The provision and support of a 211 service for Bedford, Coffee, Franklin, and Moore County residents aligns with the mission and historical service commitment of CONTACT Life Line of the Highland Rim.

(f) Anticipated Future Uses by the Community of the Proposed Service to Be Offered by the Petitioner and the Petitioner's Overall Experience Providing Information to the Community to Be Served. Petitioner has a long history of providing information and referral to the Bedford, Coffee, Franklin, and Moore County community. Moreover, Petitioner anticipates that its ongoing strong relationship with social services and community information concerns will continue. Because the availability of a uniform telephone access number for community information and social services would significantly reduce confusion or frustration regarding services available in the coverage area, while enhancing the likelihood that people in need of assistance will be directed to those specific services that would be most appropriate for and responsive to their needs it is anticipated that a significant number of coverage area residents will utilize the abbreviated access

code system proposed by Petitioner. Petitioner expects around a 2000-5000 call increase during the first twelve months of operation of the 211 service.

(g) The Type of Information Services to Be Provided by Petitioner Through an Abbreviated Dialing Code, and its Relative Value to the Public and Local Community. Through the abbreviated access number service, Petitioner would serve population of the Proposed Coverage Area, providing free information regarding community service organizations and referral guidance to individuals seeking social services and other assistance. A 211 service would tend to reduce any confusion among citizens of the Proposed Coverage Area concerning the availability of social and community services from the thousands of community service organizations located therein. Thus, through the institution of Petitioner's abbreviated access number service, individuals in need of social or community service would have access to an increased number of social services which would be made available on a more uniform basis.

(h) Agreement to Abide by Terms, Conditions and Rates for N11 Service. Petitioner agrees to abide fully by the terms, conditions and rates for N11 service set by the TRA and embodied in the Tariff. As described above in Paragraph 8(d), Petitioner expects to bear all costs of operating the N11 service, other than cellular phone connection and time charges. Therefore Petitioner's N11 rates would not exceed those set forth in the applicable Tariff.

CONCLUSION

8. Petitioner respectfully requests that the TRA allocate the 211 abbreviated dialing code for the Proposed Coverage Area.

Respectfully submitted,

Date: October 5, 2005

A handwritten signature in cursive script, reading "Sharon Johnson", is written over a horizontal line.

Sharon Johnson, Executive Director
CONTACT Life Line of the Highland Rim
P.O. Box 1614
Tullahoma, TN 37388
(931) 455-7150

Exhibit A: Consolidated Financial Statements

Statement is attached

CONTACT LIFELINE OF THE HIGHLAND RIM, INC.

STATEMENT OF RECEIPTS AND DISBURSEMENTS

FOR THE YEAR 2003

	(1)	(2)	(3)	(4)	(5)
		BUDGETED		ACTUAL AMOUNT	AMOUNT-YEAR
		AMOUNT		2002	2003
		YEAR 2003			
UNITED WAYS - BEDFORD, FARMER, HIGHLAND RIM		\$ 27000		\$ 18625	\$ 24763
CHURCHES		13000		13693	13937
GOVERNMENTAL UNITS		4000		1000	1000
CIVIC ORGANIZATIONS		2000		1977	3935
BUSINESSES & INDIVIDUALS		6000		6036	8644
FUND RAISERS		12000		5946	4973
MISCELLANEOUS OTHER		- 0 -		281	13
MEMORIALS		1000		625	3645
FOUNDATION GRANTS - NONPROFIT LIQUIDATIONS		6710		6000	16000
INTEREST		3000		1700	1445
TOTAL RECEIPTS		\$ 74910		\$ 55883	\$ 78355
DISBURSEMENTS					
AWARDS AND PRIZES		\$ 150		\$ 138	\$ 232
CONFERENCES AND MEETINGS		1500		1576	1655
EQUIPMENT PURCHASES		500		- 0 -	1448
EQUIPMENT RENTAL/MAINTENANCE		1100		720	754
INSURANCE		1500		1470	1471
MILEAGE AND TRAVEL		1500		1352	1651
MISCELLANEOUS		500		1168	1589
OFFICE SUPPLIES AND PUBLICATIONS		800		704	789
DUES AND STATE REGULATORY FEES		500		1006	671
POSTAGE		1000		254	1020
PRINTING		1000		231	81
PROFESSIONAL FEES		700		- 0 -	85
SALARIES		40700		35063	43585
PAIDROLL TAXES		8500		2931	3335
TELEPHONE		13200		13206	10541
TRAINING		500		56	132
ADVERTISING		1500		- 0 -	328
TOTAL DISBURSEMENTS		\$ 74910			\$ 68570
EXCESS RECEIPTS OVER DISBURSEMENTS					\$ 9785
CASH FUNDS					
CHECKING ACCOUNT			01/01/03		12/31/03
CERTIFICATES OF DEPOSIT			\$ 7584		\$ 18077
			53704		55196
			\$ 63488		\$ 73273
Prepared by:					
William Hausholder					

Exhibit B Budget for First Two Years of Operation

	2005	2006
Salaries	\$ 7,760 00	\$12,000 00
FICA	\$ 593 64	\$918
Resource House	\$ 6,000 00	\$1,500 00
Phone	\$ 1,346 36	\$1,500 00
Advertising	\$ 1,000 00	\$1,500 00
Printing	\$ 200 00	\$250 00
Postage	\$ 100 00	\$150 00
Mileage/Travel	\$ 500 00	\$600 00
Training	\$ 200 00	\$220 00
Offices Supplies	\$ 200 00	\$250 00
Misc	\$ 100 00	\$150 00
TOTAL	\$ 18,000.00	\$19,038 00
Income for 2-1-1 in 2005		
United Way of Bedford County	\$ 3,000 00	
United Way of Franklin County	\$ 3,000 00	
United Way of the Highland Rim	\$ 4,000 00	
Government	\$ 8,000 00	
TOTAL	\$ 18,000 00	



United Way of the Highland Rim

Coffee and Moore Counties

January 13, 2005

Pat Miller
Chairman
Tennessee Regulatory Authority
Nashville, Tennessee

Dear Mr. Miller:

As the United Way of the Highland Rim Executive Director, I have been fortunately to work with Jason Fisher and Contact Life Line. They have been one of the agencies we support for many years.

We are so pleased that Contact Life Line has petitioned for allocation of 2.1.1 for the purpose of providing health and human services information. We support them in this endeavor.

Yours truly,

Sande Hayes
Executive Director

PO Box 1433
Shelbyville, TN 37162

Phone (631) 684-8385
Fax (631) 684-3313

e-mail: unitedway@cafes.net

January 11, 2005

Mr. Pat Miller
Chairman
Tennessee Regulatory Authority

Dear Mr. Miller:

It is my pleasure to write this letter of support for Contact Life Line of the Highland Rim in their effort to establish the 211 program as a part of their organization. They have been a partner agency with United Way of Bedford County for eleven years because they provide a wonderful service for the people of our county.

We will begin our annual funding approval process this spring and will certainly be considering funding for this 211 program at that time.

Sincerely,



Ann Farrar
Executive Director



United Way of Franklin County

P O Box 157
Winchester, TN 37398
Phone 931-962-0103

February 14, 2005

Jason Fisher
Contact Lifeline
P O Box 1614
Tullahoma, TN 37388

Dear Mr Fisher

This letter is a show of support for the 2-1-1 service being considered for the Franklin County area. The Executive Director, Jeannie Amacher, as well as the entire board of the United Way of Franklin County believe this service will be a tremendous asset to the area. We feel that this would be a vehicle to people in our communities for seeking the services they need in a timely manner. This would allow the many charities, churches and government agencies to coordinate their efforts and see that no one in need is overlooked.

It is our intention to promote 2-1-1 at every opportunity, including our fall campaign.

Please keep in touch with us regarding your efforts to get this service off the ground and let us know if we can assist you in any way.

Sincerely,

Lynn A. Chesnutt
Vice President
United Way Board